



Locke Lord Edwards
2800 Financial Plaza
Providence, RI 02903
Telephone: 401-274-9200
Fax: 401-276-6611
www.lockelord.com

Richard A. Sherman
Partner
Direct Telephone: 401-276-6513
Direct Fax: 888-325-9062
richard.sherman@lockelord.com

January 19, 2015

VIA E-MAIL AND REGULAR MAIL

Ms. Anna Krasko
Remedial Project Manager
Office of Site Remediation & Restoration
U.S. Environmental Protection Agency
5 Post Office Square, Suite 100
Mail Code 0SRR07-1
Boston, Massachusetts 02109-3912

Re: Request for Information Pursuant to Section 104 of CERCLA for the Centredale
Manor Restoration Project Superfund Site

Dear Ms. Krasko:

Pursuant to the above Request for Information dated December 31, 2014 and addressed to The Original Bradford Soap Works, Inc., enclosed please find the Response of Bradford Soap International, Inc. (formerly The Original Bradford Soap Works, Inc.)

Sincerely yours,

A handwritten signature in black ink, appearing to read "Richard A. Sherman".

Richard A. Sherman

Enclosure

bcc: Man Chak Ng, Esq. (w/ enc.) - by e-mail only
Stuart R. Benton (w/ enc.) - by e-mail only
William Stone, Esq. (w/ enc.) - by e-mail only

AM 45265692.1

RESPONSE OF THE ORIGINAL BRADFORD SOAP WORKS, INC. (NOW BRADFORD
SOAP INTERNATIONAL, INC.) TO SECTION 104(E) REQUEST FOR INFORMATION
DATED DECEMBER 31, 2014, FOR THE CENTREDALE MANOR RESTORATION
PROJECT SUPERFUND SITE

1. General Information About Respondent

- i. Stuart R. Benton
- ii. Chief Financial Officer
- iii. 200 Providence Street, West Warwick, R.I. 02893
- iv. Tel: 401-381-6215; Fax: 381-6415
- v. sbenton@bradfordsoap.com

2. Respondent's Operations

a.i.a) Tall Oil Fatty Acid was delivered to Respondent's facility in West Warwick by tanker truck. Tall Oil Fatty Acid was and is often colloquially referred to as Tall Oil.

a.i.b) The quantities and frequency of deliveries during the period being investigated (1952-1971) are unknown. Tall Oil Fatty Acid continues to be delivered to Respondent's facility. Between 2003 and 2104 the average annual delivery was approximately 29,877 pounds.

a.i.c) The sources of Tall Oil Fatty Acid deliveries during the period being investigated (1952-1971) are unknown. Vendors during the period between 2003 and 2014 were Mozel, Inc., Lincoln Fine Ingredients and Mann Chemical, LLC.

a.ii.a) Tall Oil Fatty Acid was stored in aluminum tanks at Respondent's facility.

a.ii.b) The location of such storage tanks was the ground floor area inside the main production building at Respondent's facility.

a.iii. Tall Oil Fatty Acid consists mostly of oleic acid and was used in the production of soap at Respondent's facility.

a.iv. See response to Section 2.a.i.b) above.

a.v. The storage tanks at the Respondent's facility which contained Tall Oil Fatty Acid are still used today in the production of soap. They have never been disposed of.

b.i.a). Hexachlorophene (HCP) was used as an anti-bacterial ingredient in the production of some of the soaps by Respondent until its use was banned in the early 1970s. The annual quantities of HCP used are unknown, but the percentage of HCP used in any one soap was typically 1%.

b.ii.a). HCP was delivered to Respondent's facility in small fiber drums. It is believed that no plastic liners were inside these small drums.

b.ii.b) The quantities and frequency of HCP deliveries during the period being investigated (1952-1971) is unknown.

b.ii.c) The source of HCP deliveries during the period being investigated (1952-1971) is unknown, except that the FDA Establishment Inspection Reports produced by the FDA for that period of time indicate that HCP was purchased by the Respondent from Sindar Corporation, Delawanna, New Jersey.

b.iii.a) The HCP was stored in the small fiber drums in which the HCP was delivered until used in the production of some of the soaps by Respondent.

b.iii.b) The small fiber drums were located in the soap production area inside the Respondent's main building.

b.iv. Due to their construction, the small fiber drums were not capable of being reconditioned or recycled. They were disposed of as solid waste in a landfill.

b.v. HCP was never at any time manufactured at Respondent's facility.

b.vi. The only waste stream from Respondent's operations that could have contained HCP were the used small fiber drums in which the HCP was delivered, and these used small fiber drums were disposed of as solid waste in a landfill.

c. To the extent that any materials used by Respondent in the production of soap were delivered and/or stored in fiber drums, the quantity of such fiber drums is unknown, and due to their construction, the fiber drums were not capable of being reconditioned or recycled. They were disposed of as solid waste in a landfill.

3. Compliance with This Request

a.i.-iv. John Howland, current Chairman and Chief Operating Officer; employed since 1978.

Stuart Benton, current Chief Financial Officer; employed since March, 2011.

Joseph Sosnosky, former Senior Vice President of Operations (retired); dates of employment: 11/12/68 – 12/28/07.

Joseph Custodio, current Production Manager-Group Leader-Chemical; employed since 11/8/71.

Edward George, current Vice President – R&D; employed since 12/6/71.

Paul Dubuc, former Warehouse Manager-Group Leader-Warehouse (retired); dates of employment 11/6/72-8/29/14.

- a.v. All offices of Respondent and storage areas at Respondent's West Warwick facility.
- a.vi. No production records are available for the period being investigated (1952-1971); soap formula books from the 1960s.
- a.vii. The documents that were reviewed were located at Respondent's West Warwick facility.
- a.viii. The documents that were reviewed are currently located at Respondent's West Warwick facility.

DECLARATION

I declare under penalty of perjury that I am authorized to respond on behalf of Bradford Soap International, Inc. (formerly The Original Bradford Soap Works, Inc.), and the foregoing is complete, true and correct to the best of my knowledge.

Executed on January 19, 2015



Stuart R. Benton
Chief Financial Officer